

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

TRACI BERARDELLI and :
JOSEPH BERARDELLI, on behalf :
of their daughter M.B. , a minor :
Individually on their own behalf :

Plaintiffs,

v.

ALLIED SERVICES INSTITUTE :
OF REHABILITATION MEDICINE :

Defendant

No.: 3:14-CV-0691

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MOTION FOR SUMMARY JUDGMENT OF THE DEFENDANT
ALLIED SERVICES INSTITUTE OF REHABILITATION MEDICINE

The Defendant, Allied Services Institute of Rehabilitation Medicine, by and through counsel, Abrahamsen, Conaboy & Abrahamsen, P.C., hereby move for summary judgment pursuant to Federal Rule of Civil Procedure 56, for the reasons more fully set forth in Defendant's Brief in Support of this Motion, which will be filed pursuant to the local rules.

Counsel for the Defendant has discussed the filing of this Motion with counsel for the Plaintiffs, who has indicated that the Plaintiffs do not concur in the relief requested. A Certificate of Non-Concurrence is attached hereto.

WHEREFORE, Defendant, Allied Services Institute of Rehabilitation Medicine, respectfully requests the entry of an Order dismissing Plaintiffs' Complaint in its entirety with prejudice.

Respectfully Submitted,

Abrahamsen, Conaboy & Abrahamsen, P.C.

/s/ James J. Conaboy

James J. Conaboy, Esquire

Attorney ID No. 77987

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CERTIFICATE OF SERVICE

I, James J. Conaboy, Esquire, hereby certify that I have this 21st day of January, 2016 served a true and correct copy of the foregoing “MOTION FOR SUMMARY JUDGMENT OF THE DEFENDANT ALLIED SERVICES INSTITUTE OF REHABILITATION MEDICINE” upon the following listed below, via ECF.

Nicole Reimann, Esquire
Batchis, Nestle & Reimann, LLC
Two Bala Plaza, Suite 300
Bala Cynwyd, PA 19004

/s/ James J. Conaboy
James J. Conaboy, Esquire